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JUL 26 1999

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

July 26, 1999

BY HAND DELIVERY
Magalie Salas, Esq.
Federal Communications Commission
445 12th Street, SW, Room TW-B204
Washington, DC 20554

Re: Reply Comments of the
Fixed Wireless Communications Coalition
IB Docket No. 99-81

Dear Ms. Salas:

I enclose for filing with the Commission the original and nine copies of "Reply Comments of the Fixed Wireless Communications Coalition" in the above-captioned proceeding.

Kindly date-stamp and return the extra copy of this filing.

If there are any questions about this filing, please call me at the number above.

Respectfully submitted,

Mitchell Lazarus
Counsel for the
Fixed Wireless Communications Coalition

ML:cm
Enclosures

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List A B C D E

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Before the
Federal Communications Commission
Washington DC 20554

In the Matter of	)	
	)	
The Establishment of Policies and	)	IB Docket No. 99-81
Service Rules for the Mobile Satellite	)	RM-9328
Service in the 2 GHz Band	)	

REPLY COMMENTS OF THE FIXED WIRELESS COMMUNICATIONS COALITION

The Fixed Wireless Communications Coalition (FWCC)[1] submits these Reply Comments in the above-captioned proceeding.[2]

The 2 GHz MSS applicants have proposed a variety of feeder link schemes to support their operations.[3] Most of these requests seek frequencies that are heavily used by the Fixed Service. (The table in Appendix B identifies terrestrial spectrum targeted for MSS feeder links.) The FWCC's sole concern in this proceeding is the threat of diminished capacity and increased interference to the Fixed Service.

As our Comments explained, the Fixed Services are an unsung but vital part of the Nation's infrastructure, providing communications essential to the energy, transportation, and

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[1] The FWCC is a coalition of equipment manufacturers and users interested in terrestrial fixed microwave communications. Its membership includes manufacturers of microwave equipment, licensees of terrestrial fixed microwave systems and their associations, and communication service providers and their associations. Its membership also includes railroads, public utilities, petroleum and pipeline entities, public safety agencies, the broadcast industry and their respective associations, telecommunications carriers, landline and wireless, local, and interexchange carriers, and others. A list of members is attached as Appendix A.

[2] Establishment of Policies and Service Rules for the Mobile Satellite Service in the 2 GHz Band, IB Docket No. 99-81, Notice of Proposed Rulemaking, FCC 99-50 (released March 25, 1999) (Notice). The FWCC filed first-round comments on June 24, 1999.

[3] *See* Notice at ¶¶ 49-66, and particularly the table at ¶ 50.

telecommunications industries, among others, and playing a key role in public safety and other governmental operations. The Comments also showed how a series of recent Commission decisions and proposals have cut sharply into the spectrum and coordination opportunities available to the Fixed Services. Together, these actions and proposals have left the Fixed Service with insufficient spectrum for continued operation and the reasonable expansion it needs to meet the requirements of the industries and governmental agencies that rely on it for essential services.

A grant of the MSS applicants' requests for frequencies that impinge on Fixed Service spectrum would exacerbate the shrinkage of spectrum for these important functions. For these reasons, the Comments asked the Commission not to designate additional fixed service spectrum for MSS feeder links.

In the alternative, if the feeder links cannot be placed elsewhere, then we ask for rules that permit equitable sharing by the Fixed Service in practice, as well as in principle. The sharing issue is especially critical with regard to NGSO facilities, as each site "sterilizes" a much larger area against Fixed Service operations than a GSO earth station does. Accordingly, we requested rules that recognize both the realities of NGSO operation and the legitimate needs of Fixed Service operators for spectrum.[4] These requests are consistent with the FWCC position in Request for Declaratory Ruling and Petition for Rule Making of The Fixed Wireless

---

[4] Specifically, we asked for rules that limit total numbers of feeder link earth stations; collocate the feeder link earth stations of various MSS providers; site feeder link earth stations away from population centers and intercity routes; require use of the largest feasible antennas for feeder link earth stations; shield feeder link earth stations; and set standards for earth station spectrum efficiency. We also requested coordination procedures that reserve limited spectrum for Fixed Service growth; require coordination only over the azimuths actually used by an earth station; and require an earth station that accepts a higher-than-desired interference objective when coordinating to give a subsequent Fixed Service applicant the benefit of the same higher level.

Communications Coalition.[5] That proceeding seeks a declaratory ruling and changes to the Commission's rules and coordination procedures that, taken together, pave the way for more equitable sharing between terrestrial fixed services and satellite services generally.

Here, we are particularly alarmed that the Notice made no mention of the likely impact of shared-spectrum MSS feeder links on Fixed Service operations and expansion.[6] The International Bureau, which drafted the Notice, seems almost to have overlooked the thousands of Fixed Service licensees operating in many of the bands it proposes to make available for MSS feeder links. Eight other commenting parties share our concerns.[7]

We are equally troubled that nearly all of the MSS commenters follow the Bureau's lead in ignoring the present occupants of their proposed feeder link bands. With only one exception, none of the MSS comments gives even passing recognition to the fact that these bands are heavily used for the provision of needed services.[8]

The FWCC appreciates the valuable services that MSS facilities will make possible, and has no wish to hinder their deployment. But we ask the Commission to consider the equally

---

[5] RM-9649 (filed May 5, 1999). The FWCC request appeared on public notice in Report No. 2334 (released June 11, 1999).

[6] *See* Comments of FWCC at 1.

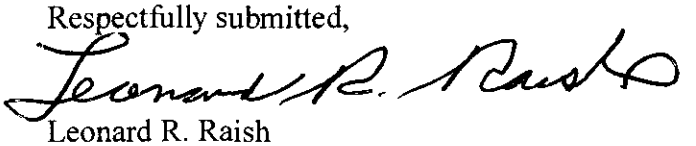
[7] Bosch Telecom, Inc.; SBC Communications, Inc.; UTC, the Telecommunications Association; Century CNN Programming, Inc.; APCO; Association of American Railroads; Tim Lynch; and Society of Broadcast Engineers, Inc.

[8] The exception is The Boeing Company. Its Comments (at 22) refer to an earlier submission that promised its system will comply with the PFD limits for 11 GHz provisionally adopted by WRC-97 in Resolution 131, and further, that Boeing will undertake whatever modifications are necessary to comply with the final interference limits adopted by WRC-2000 and the Commission. The Boeing Company, 2 GHz MSS System Ku-Band Feeder Link Technical Supplement, in File No. 179-SAT-P/LA-97(16) (filed Jan. 8, 1999).

valuable services now being offered by the terrestrial Fixed Services in the spectrum requested for feeder links. Especially in light of other spectrum losses to satellite services, Fixed Service users need these bands to meet essential needs in the energy, transportation, and telecommunications industries, among others, and in public safety and other governmental operations. The MSS feeder links should be located elsewhere.

If the Commission does require sharing in these bands, it must accommodate continued and expanded use by the Fixed Services. To that end, the FWCC asks the Commission to impose reasonable restrictions on MSS feeder link earth station numbers, collocation, siting, antenna size, shielding, and spectrum efficiency, and to establish coordination procedures that will yield equitable sharing of geography and spectrum, as outlined in our June 24 Comments.

Respectfully submitted,



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July 26, 1999

Appendix A

MEMBERS OF THE
FIXED WIRELESS COMMUNICATIONS COALITION

USERS

Association of Public-Safety Communications Officials
American Mobile Telephone Association
UTC - The Telecommunications Association
National Association of Broadcasters
Independent Cable Telecommunications Association
American Petroleum Institute
International Wireless Cable Association
Personal Communications Industry Association
CBS Communications Services
Norfolk-Southern Railroad
Union Pacific Railroad
Burlington-Northern Railroad
BellSouth
Bell Atlantic
SBC Communications, Inc.
People's Choice TV
Association of American Railroads
Nortel Networks

MANUFACTURERS

Harris Corporation -- Farinon Division
Alcatel Network Systems Inc.
Digital Microwave Corporation
Sierra Digital Communications
California Microwave, Microwave Data Systems
Tadiran Microwave Networks
Spectrapoint Wireless LLC

Appendix B

MSS FEEDER LINK REQUESTS IN TERRESTRIAL SPECTRUM[1]

Band	Applicant	Feeder Links	Terrestrial Use
5091-5250 MHz	Constellation II	NGSO uplink	Unlicensed U-NII
5150-5250 MHz	ICO	NGSO uplink	Unlicensed U-NII
6425-6575 MHz	Inmarsat Horizons	GSO downlink	CC, LTTS, OFS, BAS, CARS
6700-6875 MHz	Globalstar	NGSO downlink	CC, OFS
6700-7075 MHz	Constellation II	NGSO downlink	CC, OFS
6775-7075 MHz	MCHI Ellipso 2G	NGSO uplink	CC, OFS
10.70-10.95 & 11.20-11.45 GHz	TMI Cansat-M3	GSO uplink	CC, LTTS, OFS,
11.597-1.700 GHz[2]	Boeing	NGSO downlink	CC, LTTS, OFS
11.70-12.20 GHz	Globalstar	GSO downlink	LTTS
12.75-13.25 GHz	TMI Cansat-M3	GSO downlink	CC, LTTS, OFS, BAS, CARS
14.0-14.4 GHz	Globalstar	GSO uplink	LTTS
14.391-14.500 GHz[3]	Boeing	NGSO uplink	LTTS
17.70-18.35 GHz[4]	Celsat	GSO downlink	CC, OFS, BAS, CARS
19.30-19.70 GHz[5]	Iridium Macrocell	NGSO downlink	CC, OFS, BAS, CARS
27.50-28.35 GHz	Celsat	GSO uplink	LMDS
29.10-29.50 GHz[6]	Iridium Macrocell	NGSO uplink	LMDS

Notes

1. MSS requests are from The Establishment of Polices and Service Rules for the Mobile Satellite Service in the 2 GHz Band, IB Docket No. 99-81, Notice of Proposed Rulemaking, FCC 99-50 (released March 25, 1999) (Notice). Fixed Service data are from 47 C.F.R. § 101.101.

2. The Commission indicated it will consider the Boeing requests as part of the SkyBridge rulemaking in ET Docket No. 98-206 and related application proceedings. Notice at ¶ 61.

3. See preceding Note.

4. In IB Docket No. 98-172, the Commission proposed to designate 17.7-18.3 GHz on a primary basis for terrestrial fixed service. GSO FSS would have secondary access.

5. IB Docket 98-172 proposes to retain 19.3-19.7 GHz on a co-primary basis for both terrestrial fixed use and MSS feeder links.

6. The 29.10-29.25 GHz segment is allocated on a co-primary basis to LMDS and NGSO MSS feeder links. This is the LMDS "hub-to-sub segment," intended for to forward transmissions from the LMDS operator to subscribers. The 29.25-29.50 GHz segment is allocated to GSO FSS, co-primary with MSS. *See* Redesignation of the 27.5-29.5 GHz Frequency Band, 11 FCC Rcd 19005, 19033-34 (1996).

CERTIFICATE OF SERVICE

I, Crystal McElroy, a secretary for the law firm of Fletcher, Heald & Hildreth, P.L.C., hereby certify that true copies of the foregoing "Reply Comments" were sent this 26th day of July, 1999, via Hand-Delivery to the following:

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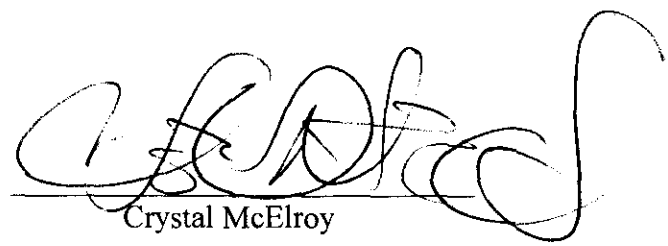

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